

# EXHIBIT A

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**Subject:** RE: Cobblestone v. Samsung

**Date:** Wednesday, March 13, 2024 at 2:19:40 PM Central Daylight Time

**From:** Olga Slobodyanyuk

**To:** ptong@raklaw.com, Jon Ma

**CC:** Brice Lynch, rak\_cobblestone@raklaw.com, QE-Cobblestone-Samsung, Melissa Smith

Peter,

At the moment, technical specifications related to chipsets and source code are withheld pursuant to MOTIE approval, which is in progress. For your information, MOTIE refers to the Act on Prevention and Divulgence and Protection of Industrial Technology, relating to national core technology ("Industrial Technology Act" or "ITA"), as determined by the Korean Ministry of Trade, Industry and Energy ("MOTIE") under the Government of South Korea. At a high-level, the relevant portion of the Industrial Technology Act requires that any export of a national core technology abroad requires prior approval from the MOTIE Minister. The Minister is empowered to form an Industrial Technology Protection Committee, which meets on a semi-regular basis to review applications under the Industrial Technology Act. Design technology for LTE/LTE\_adv/5G measuring devices is included among national core technologies. The penalty for violating the Industrial Technology Act could be up to imprisonment for no more than 15 years or a fine of up to around \$1.1 million. SEC does not, and cannot, control when the Industrial Technology Protection Committee meets and issues decisions. You can find a translation of the [Industrial Technology Act here](#) and [the original here](#).

To clarify your statement, SEC is not, and has not, refused to produce any documents which fall under the provisions of the Industrial Technology Act. SEC will produce those documents as soon as it receives the required government approval. Industrial Technology Act compliance regularly takes SEC considerable time and expense when SEC technology is at issue in U.S. litigation, as noted in connection with other cases. *See, e.g., In the Matter of Certain Integrated Circuits, Mobile Devices Containing the Same, & Components Thereof* Ord. No. 11: Granting in-Part Joint Motion to Amend the Procedural Schedule Doc. Id No. 787064?, USITC Inv. No. 337-TA-1335 (Jan. 11, 2023) (noting "delay in Samsung's ability to produce certain materials subject to the restrictions imposed by the Korean Ministry of Technology, Industry and Energy ('MOTIE')."); *In the Matter of Certain Organic Light-Emitting Diode Display Modules & Components Thereof* Ord. No. 7: Adopted Procedural Schedule, USITC Inv. No. 337-TA-1378 (Jan. 8, 2024) (discussing "delays associated with obtaining approval for discovery, as many [sic] be required, from the Korean Ministry of Trade, Industry, and Energy ('MOTIE')").

SEA and SEC are continuing to collect and produce documents, but we do not believe that, aside from the technical specifications related to chipsets and source code, there are any other P.R. 3-4 documents which fall under ITA review.

We're continuing to collect BuilIDs and will provide that information shortly.

Thank you,  
Olga